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April 28, 2023

Via ECF

Honorable Sarah Netburn
Thurgood Marshall
United States Courthouse
40 Foley Square
New York, NY 10007

Re: In re Terrorist Attacks on September 11, 2001 –
MDL – 03-md-01570 (GBD) (SN)
Leftt v. Kingdom of Saudi Arabia - 18-cv-03353

Your Honor:

We are counsel to the Leftt plaintiffs in the referenced action. This letter motion is submitted pursuant to the Courts Order of April 19th, 2023 directing plaintiff's counsel to correct docket entries 39 and 45ⁱ within the Leftt v. Kingdom of Saudi Arabia docket – 18-cv-03353, containing plaintiffs First and Second Notices of Amendment.

Your affirmant respectfully requests the Court allow plaintiff's counsel to either withdraw, amend, or supplement the defective Notices of Amendment to correct the defects contained within.

Attached hereto as Exhibit A and B are proposed Notices of Amendment which your affirmant believes will rectify the defects.

In the event counsel's proposal is unsatisfactory, your affirmant respectfully requests the Court afford counsel another opportunity to rectify these errors or suggest an alternative means to correct the defective filings.

Thank you for your time and attention to this matter.

Respectfully submitted,

Andrew C. Laufer



ACL/bd

Cc.: Counsel for KSA – via ECF

ⁱ Plaintiff's counsel filed defective notices of amendment on January 8th, 2019 and September 11, 2020 erroneously listing the reference amendment to the Ashton v. Kingdom of Saudi Arabia - 17-cv-2003 where instead said amendments should have referenced the Consolidated Amended Complaint as to the Kingdom of Saudi Arabia, ECF No. 3463.